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ZHANG, HAILIN

1/16/2008

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, ex rel.
W. A. DREW EDMONDSON, in his
capacity as ATTORNEY GENERAL
OF THE STATE OF OKLAHOMA and
OKLAHOMA SECRETARY OF THE
ENVIRONMENT C. MILES TOLBERT,
in his capacity as the TURSTEE
FOR NATURAL RESOURCES FOR
THE STATE OF OKLAHOMA,

Plaintiffs,

vs.

05-CV-0329 GKF-SAJ

TYSON FOODS, INC., TYSON
POULTRY, INC., TYSON CHICKEN,
INC., COBB-VANTRESS, INC.,
AVIAGEN, INC., CAL-MAINE FOODS,
INC., CAL-MAINE FARMS, INC.,
CARGILL, INC., CARGILL TURKEY
PRODUCTION, LLC, GEORGE'S, INC.,
GEORGE'S FARMS, INC., PETERSON
FARMS, INC., SIMMONS FOODS, INC.,
and WILLOW BROOK FOODS, INC.,

Defendants.

VIDEO DEPOSITION OF HAILIN ZHANG, Ph.D.

TAKEN ON BEHALF OF THE DEFENDANTS

JANUARY 16, 2008, BEGINNING AT 9:00 A.M.
IN OKLAHOMA CITY, OKLAHOMA

REPORTED BY: Laura L. Robertson, CSR, RPR



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1 to come.

2 Q. Did you all discuss in any respects about
3 what you would testify about today, or anything along
4 those lines?

5 A. No, I didn't know what you were going to ask
6 me.

7 Q. Right. Did you have any other meetings with
8 Mr. Nance or anyone else from the Attorney General's
9 office?

10 A. No.

11 Q. When you met with Mr. Nance, what did you
12 and Mr. Nance discuss?

13 MR. NANCE: Objection on the basis of
14 attorney-client privilege.

15 MR. GRAVES: Is it the Attorney General's or
16 the State's position that the Attorney General
17 represents employees of Oklahoma State University?

18 MR. NANCE: Yes.

19 MR. GRAVES: So you're instructing him not
20 to answer questions about your meeting with him last
21 Monday.

22 MR. NANCE: If you're going to pursue it,
23 yes, that will be my instruction to him.

24 Q. (BY MR. GRAVES) And are you taking that
25 advice to not answer?

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1 A. Well, I think the only document we went
2 through that's Dr. Johnson's affidavit --

3 Q. Well, your attorney -- Mr. Nance and
4 Mr. Hammons are advising me that they represent you
5 since you are employed by Oklahoma State University,
6 and they are recommending that you not discuss with me
7 what you all met about last Monday, and they have
8 instructed you not to answer any questions about that.

9 And I'm just asking you, are you taking that
10 advice?

11 A. Well, let me think about it. I'm not sure
12 my role is here, okay. I'm working for Oklahoma State
13 University. We are serving everybody, including
14 poultry company, poultry producer, state agencies.

15 Yes, I will take his advice.

16 Q. Okay. Other than the meeting with Mr. Nance
17 last Monday that we have already discussed, have you
18 met with anyone at any time about the litigation
19 between the State of Oklahoma and the poultry
20 companies?

21 A. No.

22 Q. I have already asked you whether you have
23 ever seen any of the documents that have been filed in
24 the lawsuit, but have you -- I want to ask you now,
25 have you ever seen any discovery requests or other